

Remarks

Claims 1 and 4-17 are now pending in this application. Applicants have amended claims 1, 12, and 13 and presented claims 16 and 17 to clarify the claimed invention. Applicants respectfully request favorable reconsideration of this application.

The Examiner rejected claims 1, 4-8, 10-13 and 15 under 35 U.S.C. § 103(a) as being unpatentable over Topp et al. in view of WO 01/02953 to Andersson, in view of ABB in view of Fielding et al. The Examiner rejected claims 9 and 14 under 35 U.S.C. § 103(a) as being unpatentable over Topp et al. in view of ABB in view of Fielding et al. and further in view of U.S. patent 7,010,294 to Pyotsia et al.

The combination of Topp et al., Andersson, ABB and Fielding et al. does not suggest the invention recited in claims 1, 4-8, 10-13 and 15 since, among other things, the combination does not suggest a method to provide access to Aspects of Aspect Objects from a standard web browser, where the web browser sends a request of access to a certain Aspect of an Aspect Object. The request includes a URL address. The URL address specifies the Aspect, the Aspect Object. The method enables the use of a standard web browser to access Aspects of Aspect Objects representing functions of real world objects connected to a control system and invoke functionality of the Aspect to carry out the function of the real-world object. Section 3.3 of Topp et al. only suggests retrieving information, such as operational status, configuration, diagnosis, measurement data and documentation. Topp et al. does not suggest how to access from a web browser different functions of a real-world object represented as an Aspect Object where the

functionality resides in a number of unrelated applications. As discussed in the specification at page 11, lines 8-10, and as recited in the claims, the claimed invention can utilize a web browser to perform actual functions. Utilizing internet technology to resolve access to an aspect of an aspect object is not obvious in view of the cited references, which require installation of software modules on a client device to access an application integrated in a system.

On the other hand, Andersson requires that specific software modules be installed on a client device in order to access an application integrated in a system. Combining Andersson with a web presentation unit does not make sense since Andersson requires the use of the software modules in the client and interaction with the software modules by the rest of the system. Modifying Andersson as suggested in the office action would be only in hindsight in view of the advancements of the claimed invention. Additionally, since Andersson provides a workable solution to the problem, there is no motivation for making the suggested modifications.

Additionally, Andersson provides a method of integrating an application in a computerized system and the system is made for interacting with the particular application. Therefore, modifying Andersson as suggested in the office action to include a generic world wide web presentation unit is contrary to Andersson. Furthermore, the modifications suggested in the office action would not address the requirement that Andersson has for the system to interact with a specific software modules. Additionally, Andersson does not include any suggestion of how to resolve access to an aspect of an aspect object via the internet or via an intranet based on internet technology such as the world wide presentation unit recited in the claims.

ABB does not overcome the above-described deficiencies of Topp et al. and Andersson. Along these lines, ABB appears to require an additional web server machine in a server layer that contains web server software. The claimed invention can avoid the need for such an additional server layer and can simply utilize a world wide web presentation unit operating on devices such as cell phones, PDA's, or personal computers.

Furthermore, Fielding et al. only includes a vague statement regarding transitions between protocols. This statement does not suggest including contextual information regarding the device and characteristics of the world wide web presentation unit so that the messages will be adapted to various devices, whether a mobile phone, PDA, lap top or desk top computer. The adaptability of the claimed invention facilitates control of real world objects connected to a control system through a web browser on any device capable of running a web browser. The combination of references does not suggest such adaptability.

In view of the above, the combination of Topp et al., Andersson, ABB and Fielding et al. does not suggest the invention recited in claims 1, 4-8, 10-13 and 15. Therefore, the combination of Topp et al., Andersson, ABB and Fielding et al. does not make the invention recited in claims 1, 4-8, 10-13 and 15 obvious. Accordingly, Applicants respectfully request withdrawal of this rejection.

The combination of Andersson, Topp et al., ABB, Fielding et al. and Pytosia et al. does not suggest the invention recited in claims 9 and 14 since, among other things, the combination

does not suggest a method to provide access to Aspects of Aspect Objects from a standard web browser, where the web browser sends a request of access to a certain Aspect of an Aspect Object. The request includes a URL address. The URL address specifies the Aspect, the Aspect Object. The method enables the use of a standard web browser to access Aspects of Aspect Objects representing functions of real world objects connected to a control system and invoke functionality of the Aspect to carry out the function of the real-world object. The shortcomings of Andersson, Topp et al., ABB, and Fielding et al. are set forth above. Pyotsia et al. does not overcome the deficiencies of these references. The Examiner only cites Pyotsia et al. as suggesting a control system including a mobile terminal communicating through the internet. Even if Pyotsia et al. were to suggest such elements, Pyotsia et al. does not suggest the other elements of the invention, such as the arrangement of Aspects and Aspect Objects and accessing different functions of real-world objects represented as Aspect Objects where functionality resides in applications unrelated to a world wide web presentation unit.

Accordingly, the combination of Topp et al., Andersson, ABB, Fielding et al. and Pyotsia et al. does not suggest the invention recited in claims 9 and 14. It follow that the combination of Topp et al., Andersson, ABB, Fielding et al. and Pyotsia et al. does not make the invention recited in claims 9 and 14 obvious. Consequently, Applicants respectfully request withdrawal of this rejection.

In view of the above, the references relied upon in the office action do not suggest patentable features of the claimed invention. Therefore, the references relied upon in the office action do not make the claimed invention obvious. Accordingly, Applicants submit that the

claimed invention is patentable over the cited references and respectfully request withdrawal of the rejections based on the cited references.

If an interview would advance the prosecution of this application, Applicants respectfully urge the Examiner to contact the undersigned at the telephone number listed below.

The undersigned authorizes the Commissioner to charge fee insufficiency and credit overpayment associated with this communication to Deposit Account No. 22-0261.

Respectfully submitted,

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